

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: : Chapter 13  
:   
LAWRENCE EDWARD ROBINSON :   
Debtor : Bankruptcy No 17-17244-PMM

**RESPONSE TO TRUSTEE MOTION TO DISMISS**

AND NOW COMES Debtor, by and through his attorney Everett Cook, Esq., who responded to the Trustee motion to dismiss and in support of his response believes and therefore avers the following;

1. Admitted

2. Admitted

3. Admitted in part Denied in part. It is admitted that an amended plan was not filed, it is denied that the plan is not Feasible. By way of further answer the debtor had agreed to re pay the post-petition arrears that was the subject of the motion for relief from stay filed by Specialized Loan Servicing. At the time the agreement was reached with the bank a stipulation was entered into wherein the Debtor, through counsel, would file an amended plan to pay back the arrears. This stipulation was signed and filed with the court.

Debtor had experienced an interruption in income but was able to rectify that situation and as a result, had funds sufficient to pay back the arrears directly to the bank within two months. Debtor did in fact send two payments, one on March 3th for \$3,000 and one on April 14th for \$4,670.88, proof of these payments is attached to this motion as Exhibit A. The regular mortgage payment is \$1,204.96 which means that debtor paid \$5,260.96 (\$3,000 + \$4,670.88 - \$2,409.92 = \$5,260.96) in additional funds directly to the bank which was in excess

of the \$3,971.85 contemplated by the stipulation. The \$3,971.85 included fees and costs of \$1,038 associated with the Motion for relief from stay.

As a result, the modification of the plan was unnecessary as the bank had been made whole through direct payments by the Debtor. Counsel for debtor has reached out to bank and banks attorney to try and resolve this issue through removing or altering the stipulation that was filed at docket enter 30 on 3/30/2022 and it is the understanding of Debtor's attorney that counsel for the bank is awaiting confirmation from her client that the arrears are in fact fully paid.

WHEREFORE Debtor prays this honorable court dismiss the Trustee Motion to Dismiss or in the alternative continue the hearing on this matter until proof certain can be obtained from the bank that the funds have or have not been received.

Date: 8/1/2022

Respectfully submitted,

By: 

Everett Cook, Esquire  
Attorney for Plaintiff  
I.D. No. 202039

**LAW OFFICES OF EVERETT COOK, P.C.**  
1605 N. Cedar Crest Blvd., Suite 520  
Allentown, PA 18104  
Phone: 610-351-3566  
Fax: 610-351-3556  
general@everettcooklaw.com

Exhibit “A”

# Wells Fargo Everyday Checking

March 23, 2022 ■ Page 1 of 6



LAWRENCE E ROBINSON  
125 WOODCREST CIR  
ALLENTOWN PA 18103-5832

## Questions?

Available by phone 24 hours a day, 7 days a week:

We accept all relay calls, including 711

**1-800-TO-WELLS** (1-800-869-3557)

En español: 1-877-727-2932

Online: [wellsfargo.com](https://wellsfargo.com)

Write: Wells Fargo Bank, N.A. (345)  
P.O. Box 6995  
Portland, OR 97228-6995

## You and Wells Fargo

Thank you for being a loyal Wells Fargo customer. We value your trust in our company and look forward to continuing to serve you with your financial needs.

## Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to [wellsfargo.com](https://wellsfargo.com) or call the number above if you have questions or if you would like to add new services.

Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input checked="" type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Auto Transfer/Payment	<input type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Overdraft Service	<input type="checkbox"/>

## Other Wells Fargo Benefits

### Help take control of your finances with a Wells Fargo personal loan.

Whether it's managing debt, making a large purchase, improving your home, or paying for unexpected expenses, a personal loan may be able to help. See personalized rates and payments in minutes with no impact to your credit score.

Get started at [wellsfargo.com/personalloan](https://wellsfargo.com/personalloan).

## Statement period activity summary

Beginning balance on 2/25	\$857.44
Deposits/Additions	4,331.00
Withdrawals/Subtractions	- 5,134.38
Ending balance on 3/23	\$54.06

Account number: ~~4444~~ 8287

**LAWRENCE E ROBINSON**

Pennsylvania account terms and conditions apply

For Direct Deposit use  
Routing Number (RTN): 031000503

## Overdraft Protection

Your account is linked to the following for Overdraft Protection:

■ Savings - 000008826580576

March 23, 2022 ■ Page 2 of 6

WELLS  
FARGO

## Transaction history

Date	Check Number	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
2/25		Purchase authorized on 02/25 Emmaus Market Allentown PA P000000534600284 Card 6142		17.21	
2/25		Purchase with Cash Back \$ 75.00 authorized on 02/25 USPS PO 41012809 442 Hami Allentown PA P382056721750493 Card 6142		80.93	759.30
2/28		Zelle From Latoya Watkisstewart on 02/26 Ref # Bacrsi81Saf Rent	816.00		
2/28		Purchase authorized on 02/26 7-Eleven Allentown PA P000000332855989 Card 6142		17.26	
2/28		Purchase authorized on 02/26 Prime Video*118072 888-802-3080 WA S462058122406117 Card 6142		5.99	
2/28		Purchase authorized on 02/27 Dollar General 1 Dg 15875 Allentown PA P302058677318949 Card 6142		17.89	
2/28		Purchase authorized on 02/28 Giant Fuel 6074 3015 W Allentown PA P000000686089232 Card 6142		44.65	1,489.51
3/1		Edeposit IN Branch/Store 03/01/22 04:53:33 Pm 1901 S 4th St Allentown PA 6142	200.00		
3/1		Recurring Payment authorized on 02/28 Consumer Cellular 800-6864460 OR S462059405726314 Card 6142		76.01	
3/1		Purchase authorized on 02/28 Shammy Shine Car W Allentown PA S582059805400939 Card 6142		15.00	
3/1		Online Transfer to Robinson L Way2Save Savings xxxxxx0576 Ref #1b0Dpz3Xr on 03/01/22		100.00	
3/1		Zelle to Luther Wayne on 03/01 Ref #Rp0Q9Lnpv2		200.00	
3/1		Purchase authorized on 03/01 Cycle Gear #86 Allentown PA P000000787755220 Card 6142		8.46	1,290.04
3/2		Transfer From Alleyne Michael on 03/02 Ref # Pp0Q9NV676 Big Brother Assist	250.00		
3/2		Purchase authorized on 03/02 Wawa 8150 Allentown PA P582061798429609 Card 6142		0.12	
3/2		Purchase authorized on 03/02 Sunoco 05586763 Allentown PA P000000475217341 Card 6142		12.28	1,527.64
3/3		SSA Treas 310 Xxsoc Sec 030322 xxxxx5580A SSA Lawrence E Robinson	1,396.00		2,923.64
3/7		Mobile Deposit : Ref Number :018050493504	1,519.00		
3/7		ATM Cash Deposit on 03/07 1901 S 4th St Allentown PA 0001982 ATM ID 0078Z Card 6142	150.00		
3/7		Recurring Payment authorized on 03/04 Adobe Creative Clo 408-536-6000 CA S582063546553832 Card 6142		56.17	
3/7		Purchase authorized on 03/04 Exxonmobil 4797 Jersey City NJ S382064038263423 Card 6142		61.67	
3/7		Purchase authorized on 03/05 Cvs/Pharmacy #00 00858-3 Allentown PA P382065123084021 Card 6142		10.49	
3/7		Zelle to Luther Wayne on 03/07 Ref #Rp0Q9Yghzh Wayne Has A Balance of \$150.		50.00	
3/7		< Business to Business ACH Debit - Truebill Premium St-T6D8G0V8Q9A6 Truebill Inc		5.00	
3/7		Ezpassnyrebill Rebill Ezp 220306 1203301 Lawrence *Robinson		80.00	4,329.31
3/8		Purchase authorized on 03/07 Aci*Sls Mortgage P 720-241-7200 CO S302066584716694 Card 6142		3,000.00	
3/8		Prog Advanced Ins Prem 220307 xxxxx1702 Lawre Lawrence Robinson		279.30	
3/8		Paypal Inst Xfer 220308 Apple.Com Bill The Clothes Zone		15.89	1,034.12
3/9		Recurring Payment authorized on 03/07 Paramount+ 888-274-5343 CA S462066812058468 Card 6142		5.99	
3/9		Purchase authorized on 03/09 Speedway 3283 Easton Butztown PA P000000673532149 Card 6142		27.48	1,000.65
3/10		Recurring Payment authorized on 03/08 Tracfone *Servi Tracfone.Com FL S382067520280681 Card 6142		33.81	
3/10		Paypal Inst Xfer 220310 Apple.Com Bill The Clothes Zone		5.29	

# Wells Fargo Everyday Checking

April 25, 2022 ■ Page 1 of 8



LAWRENCE E ROBINSON  
125 WOODCREST CIR  
ALLENTOWN PA 18103-5832

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Online Bill Pay	<input checked="" type="checkbox"/>	Auto Transfer/Payment	<input type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Overdraft Service	<input type="checkbox"/>

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Get started at [wellsfargo.com/personalloan](https://wellsfargo.com/personalloan).

## Statement period activity summary

Beginning balance on 3/24	\$54.06
Deposits/Additions	10,863.02
Withdrawals/Subtractions	- 10,608.43
Ending balance on 4/25	\$308.65

Account number: **██████████8287**

**LAWRENCE E ROBINSON**

Pennsylvania account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 031000503

## Overdraft Protection

Your account is linked to the following for Overdraft Protection:

■ Savings - 000008826580576

April 25, 2022 ■ Page 4 of 8

WELLS  
FARGO**Transaction history (continued)**

Date	Check Number	Description	Deposits/ Additions	Withdrawals/ Subtractions	Ending daily balance
4/12		Purchase authorized on 04/11 Audible*1H44Y0702 Amzn.Com/Bill NJ S382101817116450 Card 6142		15.94	
4/12		Paypal Inst Xfer 220412 Apple.Com Bill The Clothes Zone		74.19	6,682.49
4/13		Purchase authorized on 04/13 Daisy Hill Market Allentown PA P582103767284507 Card 6142		65.29	
4/13		Purchase authorized on 04/13 Staples 0204 Allentown PA P462103838285979 Card 6142		155.80	
4/13		Purchase authorized on 04/13 Dollar General 1 Dg 15875 Allentown PA P462104008007727 Card 6142		50.77	6,410.63
4/14		Purchase authorized on 04/13 Aci*Sls Mortgage P 720-241-7200 CO S302103565809931 Card 6142		4,670.88	
4/14		Purchase authorized on 04/13 Sunoco 0491247300 Allentown PA S382103851846318 Card 6142		17.49	1,722.26
4/15		ATM Withdrawal authorized on 04/15 1901 S 4th St Allentown PA 0007013 ATM ID 0078Z Card 6142		200.00	
4/15		Purchase authorized on 04/15 Cp Penndot Rid Allentown Whitehall PA P382105705730737 Card 6142		30.00	
4/15		Purchase authorized on 04/15 Dollar General 1 Dg 15875 Allentown PA P582105745272077 Card 6142		32.14	
4/15		ATM Withdrawal authorized on 04/15 1901 S 4th St Allentown PA 0008320 ATM ID 0078Q Card 7470		200.00	
4/15		Purchase authorized on 04/15 Dollar General 1 Dg 15875 Allentown PA P582105760553029 Card 7470		19.02	1,241.10
4/18		Zelle From Darryl Purdy on 04/17 Ref # Nav0H23J9Z2T	150.00		
4/18		Purchase authorized on 04/15 Turkey Hill #0215 Easton PA S582105846359348 Card 7470		20.00	
4/18		Purchase authorized on 04/15 Cvs/Pharmacy #0085 Allentown PA S582105614882578 Card 7470		22.79	
4/18		Purchase authorized on 04/17 Top Star #112 Hellertown Hellertown PA P302107618882384 Card 7470		60.79	
4/18		Purchase authorized on 04/17 Darien Tpke (W) Darien CT P382108131357483 Card 7470		30.00	
4/18		Purchase authorized on 04/18 Superfood Fresh Supermar Allentown PA P382108615329737 Card 7470		13.16	
4/18		Prog Advanced Ins Prem 220415 xxxxx1366 Lawre Lawrence Robinson		33.07	
4/18		Paypal Inst Xfer 220417 Apple.Com Bill The Clothes Zone		2.99	
4/18		Ezpassnyrebill Rebill Ezp 220416 6173931 Lawrence *Robinson		110.00	1,098.30
4/19		Purchase authorized on 04/18 South Mountain Bev Allentown PA S462108616085488 Card 7470		18.00	
4/19		Purchase with Cash Back \$ 20.00 authorized on 04/19 Giant 6074 Allentown PA P382109663942142 Card 7470		59.76	1,020.54
4/20		Purchase authorized on 04/19 Turkey Hill #0298 Bethlehem PA S382109601190514 Card 7470		40.00	
4/20		Purchase authorized on 04/19 Turkey Hill #0298 Bethlehem PA S302109601670023 Card 7470		19.29	
4/20		Purchase authorized on 04/20 Dollar General 1 Dg 15875 Allentown PA P582110570546184 Card 7470		16.95	
4/20		Verizon Paymentrec Urring 4520498320001 Lawrence Robinson		119.94	
4/20		Paypal Inst Xfer 220420 Apple.Com Bill The Clothes Zone		13.77	810.59
4/21		Zelle From Monique Lucas on 04/21 Ref # Bacgn24S47Jz	100.00		
4/21		Purchase authorized on 04/20 Sq *Autoluxe Motor Gosq.Com PA S302110845963743 Card 7470		581.94	
4/21		Purchase authorized on 04/20 Giant 6074 Allentown PA P462111053567317 Card 7470		32.93	
4/21		Purchase authorized on 04/21 Superfood Fresh Supermar Allentown PA P582111795022820 Card 7470		6.49	
4/21		Purchase authorized on 04/21 Dollar General 1 Dg 15875 Allentown PA P582111849786811 Card 7470		28.78	
4/21		Purchase authorized on 04/21 Dollar General 1 Dg 15875 Allentown PA P582111853470305 Card 7470		3.18	257.27